

Submission on the discussion document – Managing our wetlands in the coastal marine area

September 2022

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce an estimated 50 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates, and assist in developing a highly skilled workforce within a safe and sustainable work environment.

General comments

Adequate provision must be made in national instruments and regulations such as the *Essential Freshwater* regulatory package to recognise existing and potential aggregate and sand deposits and provide for their extraction. Quarry materials are not universally available and can only be sourced from where they are located (locationally constrained due to geology). Without a consenting pathway that provides for adequate access to resources at workable locations, there is the real risk of losing access to such proximate resources.

Key points of our submission

- 1) We support proposed changes to replace all references to natural wetland in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F) with natural inland wetland and define 'natural inland wetland' by reference to the existing definition in the National Policy Statement for Freshwater Management (NPS-FM). This would clarify that the NES-F wetland provisions no longer apply to natural wetlands in the Coastal Marine Area (CMA).
- 2) We agree that applying the NES-F wetland provisions in the CMA could prevent or constrain activities unlikely to cause the loss or degradation of natural wetlands, which goes beyond the original policy intent.

We make the following submission in relation to the discussion document – [Managing our wetlands in the coastal marine area](#).

Consent pathways

The current wetland regulations are preventing access to resources for the construction of specified infrastructure (as defined in the NPS-FM). Because the regulations already provide a consent pathway for the construction of specified infrastructure, it is sensible that a consent pathway also be provided for the resources necessary for the construction and maintenance of that infrastructure.

The new consent pathways being proposed through the Managing our wetlands work programme (ie, for quarrying, fills, mineral mining, urban development) are proposed to

only apply to natural inland wetlands and therefore if the NES-F remains unchanged, in relation to the CMA, quarrying activities will remain prohibited in the CMA.

Quarrying activities currently exist in the CMA providing aggregates and sand to local communities. These are managed within a regional risk-based approach to managing wetlands, which provides scope for regional councils (through coastal plans) to determine, and consult with their communities and Te Tiriti partners on, what activities should be regulated to best protect wetlands in the CMA.

Consultation questions

1. Do you agree that the current application of the NES-F to the CMA requires amendment?

We agree that amendment is required to provide a consenting pathway for quarrying activities within the CMA. Such activities will continue to be managed through local coastal plans.

2. Do you agree with the proposal to amend the NES-F wetland provisions to no longer apply to the CMA?

We agree with the proposal to amend the NES-F wetland provisions to no longer apply to the CMA. This will allow for quarrying activities to be managed through coastal plans and support the provision of resources needed by local communities.

3. Do you think the wording changes proposed in the preferred option make it clear that the NES-F would no longer apply in the CMA?

We agree that the wording changes proposed makes it clear that the NES-F only applies to natural inland wetlands and therefore not to the CMA.

4. Are there any reasons to prefer other options? If so, what are they?

We don't believe there are any reasons to consider other options.

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